

UNITED STATES DISTRICT COURT

For the

District of Arizona

In the Matter of the Search of)
 a 2001 Silver Dodge Caravan, bearing VIN)
 1B4GP253X2B558838 and Arizona License) Case No. 22-04369MB
 Plate ATA6BXA)
)

SEARCH AND SEIZURE WARRANT

To: Any authorized law enforcement officer

An application by a federal law enforcement officer of an attorney for the government requests the search of the following person or property located in the _____ District of _____ Arizona _____
(identify the person or describe the property to be searched and give its location):

SEE ATTACHMENT A

The person or property to be searched, described above, is believed to conceal *(identify the person or describe the property to be seized):*

SEE ATTACHMENT B

I find that the affidavit(s), or any recorded testimony, establish probable cause to search and seized the person or property.

YOU ARE COMMANDED to executed this warrant on or before October 19, 2022
(not to exceed 14 days)

☒ in the daytime 6:00 a.m. to 10 p.m. ☐ at any time in the day or night as I find reasonable cause has been established

Unless delayed notice is authorized below, you must give a copy of the search warrant and a receipt for the property taken to the person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the place where the property was taken.

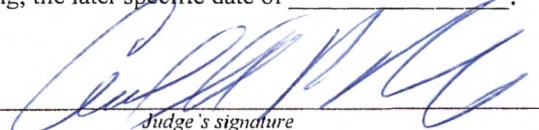
The officer executing this warrant, or an officer present during the execution of the warrant, must prepare an inventory as required by law and promptly return this warrant and inventory to Any United States Magistrate Judge _____
 On Duty in the District of Arizona _____.

☐ I find that immediate notification may have an adverse result listed in 18 U.S.C. § 2705 (except for the delay of trial), and authorize the officer executing this warrant to delay notice to the person who, or whose property, will be searched or seized *(check the appropriate box)* ☐ for _____ days *(not to exceed 30)*.

☐ until, the facts justifying, the later specific date of _____.

Date and time issued:

10/5/2022 at 12:17pm



Judge's signature

City and state: Flagstaff, Arizona

Hon. Camille D. Bibles, United States Magistrate Judge
Printed name and title

Return		
Case No.:	Date and time warrant executed:	Copy of warrant and inventory left with:
Inventory made in the presence of :		
Inventory of the property taken and name of any person(s) seized:		
<p style="text-align: center;">Certification</p> <p>I declare under penalty of perjury that this inventory is correct and was returned along with the original warrant to the designated judge.</p> <p>Date: _____</p> <p style="text-align: right;">_____</p> <p style="text-align: right;"><i>Executing officer's signature</i></p> <p style="text-align: right;">_____</p> <p style="text-align: right;"><i>Printed name and title</i></p>		

ATTACHMENT A

DESCRIPTION OF THE PERSON, PROPERTY, AND ITEMS TO BE SEARCHED

PROPERTY:

2001 silver Dodge Caravan bearing Vehicle Identification Number (VIN)
1B4GP253X2B558838 and Arizona License Plate ATA6BXA.



ITEMS:

Search for all items listed within ATTACHMENT B.

ATTACHMENT B

ITEMS TO BE SEARCHED AND SEIZED

1. Any firearms, firearm projectiles, spent shell casings, and/or live firearm ammunition located inside of the vehicle.
2. Any parts of a firearm and/or accessories and magazines.
3. Indicia of ownership of firearms and/or firearm parts.
4. Spent or live firearm cartridges of any caliber, gauge, or make.
5. Knives, blades, machetes and/or any sharp object resembling a knife.
6. Any evidence of assault or homicide, including but not limited to blood, dried blood, substances that appear to be blood, and other biological evidence which may be found on surfaces in the interior or exterior of the vehicle.
7. Indicia of occupancy and/or ownership of the vehicle, including but not limited to, mail showing a person's address, receipts, vehicle title, registration, and identification cards.
8. Photographs and/or video of the vehicle and the things seized.

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APPLICATION FOR A SEARCH WARRANT

I, Special Agent Eric D. Stoddard, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that there is now concealed on the following person or property located in the District of Arizona.

SEE ATTACHMENT A

The person or property to be searched, described above, is believed to conceal *(identify the person or describe the property to be seized)*.

SEE ATTACHMENT B

The basis for the search under Fed. R. Crim. P. 41(c) is *(check one or more)*:

- ☒ evidence of a crime;
☒ contraband, fruits of crime, or other items illegally possessed;
☒ property designed for use, intended for use, or used in committing a crime;
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of

18 U.S.C. §§ 1153, 1111 -- First Degree Murder

18 U.S.C. §§ 1153, 1111 and 3559(f) -- First Degree Murder of a Child

18 U.S.C. §§ 924(c)(1)(A) and (j) -- Use of a Firearm During a Crime of Violence, Resulting in Death

☒ Continued on the attached sheet: (see attached affidavit) further, the affidavit in support of this Search Warrant is herein incorporated by reference.

☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103 A, the basis of which is set forth on the attached sheet.

Date: 10/5/2022

DIMITRA SAMPSON

Digitally signed by DIMITRA SAMPSON
Date: 2022.10.05 09:54:59 -0700

Reviewed by Dimitra Sampson, AUSA

☒ Sworn by Telephone

Sworn to before me and signed in my presence.

Date: 10/5/2022

City and state: Flagstaff, Arizona

Applicant's signature

Eric D. Stoddard, Special Agent, FBI

Printed name and title

Judge's signature

Hon. Camille D. Bibles, United States Magistrate Judge

Printed name and title

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DESCRIPTION OF THE PERSON, PROPERTY, AND ITEMS TO BE SEARCHED

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2001 silver Dodge Caravan bearing Vehicle Identification Number (VIN)
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ITEMS:

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AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR A SEARCH WARRANT

Your affiant, Eric Stoddard, a Special Agent with Federal Bureau of Investigation (FBI), being duly sworn, deposes and states as follows:

INTRODUCTION

The facts of this case, as more fully detailed herein, occurred from September 28, 2022, through September 29, 2022, in which Lydia Carol King (King) murdered M.K., a 28-year-old, Navajo Indian male, and John Doe, a six-year-old Navajo Indian male. These offenses occurred near Kaibeto, Arizona, a location within the exterior boundaries of the Navajo Indian Reservation in the District of Arizona. After committing these offenses, King drove to Flagstaff, Arizona in a 2001 silver Dodge Caravan, bearing Vehicle Identification Number (VIN) 1B4GP253X2B558838 and Arizona License Plate ATA6BXA. King was detained by the Flagstaff Police Department and the 2001 silver Dodge Caravan was towed to the Flagstaff Resident Agency of the Federal Bureau of Investigation.

PRELIMINARY BACKGROUND INFORMATION

1. I, Eric Stoddard, have been employed as a Special Agent of the Federal Bureau of Investigation since May of 2006, and am currently assigned to the Phoenix Field Office, Flagstaff Resident Agency. I am assigned to conduct investigations of crimes occurring within the District of Arizona, which include violent crimes on the Navajo Indian Reservation such as homicide investigations. I have received training and experience in investigating such crimes (as well as a variety of other crimes). The statements contained in this Affidavit are based on my experience and background as a Special Agent and on information provided by other law enforcement agents. As a federal agent, I am authorized to investigate violations of United States laws and to execute warrants issued under the authority of the United States.

2. This Affidavit seeks a search warrant for the 2001 silver Dodge Caravan, with Vehicle Identification Number (VIN) 1B4GP253X2B558838 and Arizona License

1 Plate ATA6BXA, discovered in the parking lot of the Flagstaff Medical Center, Flagstaff,
2 Arizona, at time of King's detention, as more fully described in Attachment A, to locate
3 the items described in Attachment B, including any evidence of violations of Title 18
4 U.S.C. §§ 1153 and 1111, First Degree Murder, Title 18 U.S.C. §§ 1153, 1111, and 3559(f),
5 First Degree Murder of a Child, and Title 18 U.S.C. §§ 924(c)(1)(A) and (j), Use of a
6 Firearm During a Crime of Violence Resulting in Death.

7 3. Because this Affidavit is being submitted for the limited purpose of securing
8 a search warrant, I have not included each and every fact known to me or the FBI
9 concerning this investigation. I have set forth only those facts that I believe are necessary
10 to establish probable cause that evidence of violations of Title 18 U.S.C. §§ 1153 and 1111,
11 First Degree Murder, Title 18 U.S.C. §§ 1153, 1111, and 3559(f), First Degree Murder of
12 a Child, and Title 18 U.S.C. §§ 924(c)(1)(A) and (j), Use of a Firearm During a Crime of
13 Violence Resulting in Death, as more fully described in Attachment B, is located in the
14 2001 silver Dodge Caravan, bearing Vehicle Identification Number (VIN)
15 1B4GP253X2B558838 and Arizona License Plate ATA6BXA, more particularly
16 described in Attachment A.

17 DETAILS OF THE INVESTIGATION

18 4. On September 28, 2022, at approximately 10:26 p.m. Mountain Standard
19 Time (MST), SA Stoddard was informed by Navajo Nation Criminal Investigator (CI)
20 Crystal Thinn of a double homicide which occurred between Kaibeto, Arizona and Red
21 Lake, Arizona, on the Navajo Indian Reservation. CI Thinn advised that M.K, a 28-year-
22 old Navajo Indian male, and his son, John Doe, a six-year-old Navajo Indian male, had
23 been shot and were both deceased. CI Thinn further advised several vehicles travelling
24 on Indian Route 21 between Kaibeto and Red Lake had been struck by what was reported
25 to be gunfire. Your Affiant responded to the scene and observed that M.K. had what
26 appeared to be a penetrating gunshot wound to his back, a grazing gunshot wound to his
27 back, and a penetrating gunshot wound to his head. Six-year-old John Doe had what
28 appeared to be a single penetrating gunshot wound to his face below his right eye.

1 5. CI Thinn conducted an interview of Lydia King's brother, Mychael Black
2 ("Black"), at which time he said on the evening of September 28, 2022, he observed M.K.
3 and King outside their mother's residence near a vehicle. Black heard M.K. tell King to
4 be careful, that it was loaded, referring to a firearm King had. Black then heard King say
5 she was sorry, and then heard several gunshots. Black and his brother ran into the woods
6 nearby and heard what sounded like a gunshot traveling past them.

7 6. In the early morning hours of September 29, 2022, your Affiant was
8 informed that the Flagstaff Police Department ("FPD") had detained a Lydia King at the
9 Flagstaff Medical Center ("FMC"). King had approached an employee at the emergency
10 department and advised there were two dead bodies on the Navajo Indian Reservation, and
11 she was the one who had killed them. FMC security staff made contact with King and
12 recovered a set of Dodge keys from her person. FMC security staff contacted the FPD,
13 and upon their arrival reported the location of a silver Dodge Caravan in their parking lot
14 belonging to King. FBI Task Force Officer Nicolas Ashland performed a visual
15 inspection of the 2001 silver Dodge Caravan, bearing Vehicle Identification Number (VIN)
16 1B4GP253X2B558838 and Arizona License Plate ATA6BXA, parked in the FMC parking
17 lot. Officer Ashland observed an AR platform rifle on the passenger seat as well as
18 multiple spent .223 caliber shell casings on the passenger side floorboard. Shortly
19 thereafter, FBI Special Agent John Garcia arrived at FMC. The key recovered from King
20 was found to operate the silver 2001 Dodge Caravan. SA Garcia arranged the transport
21 of the silver 2001 Dodge Caravan to the Flagstaff Resident Agency of the FBI and King
22 was transported to the FPD pending an interview by the FBI.

23 7. Several hours later, your Affiant contacted King at the FPD. After advising
24 King of her rights, she said she had a thought wondering if her husband, M.K., and her
25 brothers were going to kill her or "jump" her. She said she would kill them first. King
26 was asked if M.K. had ever physically assaulted her or harmed her and she said no. She
27 said at one point he pushed her out of the way, but he had never assaulted her. She said
28 her brothers had never assaulted her either. King indicated there was some "rough

1 housing” between her and one of her brothers, which she described as normal brother and
2 sister fighting. King said her oldest brother, who was not present at the residence on
3 September 28, 2022, had raped her numerous times in the past.

4 8. King was asked to describe how the shooting took place. She said she had
5 a rifle in her hand and fired one shot into the ground near M.K.’s feet. He turned and ran
6 towards the vehicle and was in the vicinity of where she knew he kept weapons. She shot
7 him several times in the back, and he fell to the ground. She approached and shot him
8 once in the head. Her son, John Doe, saw or heard this and was attempting to get away.
9 She “caught” him between the vehicles, and he was shaking pleading with her not to harm
10 him. She told him she was sorry then shot him once in the face. King pointed to her face
11 while describing the shooting, pointing to the same area where your Affiant observed the
12 penetrating gunshot wound to John Doe’s face. After she shot both M.K. and John Doe,
13 she left in a vehicle, and as she was driving on the highway, she shot at several passing
14 vehicles. She said she thought she struck several of the vehicles but did not think she
15 killed any of the occupants. King is also an Indian.

16 CONCLUSION

17 9. Based on the foregoing, I respectfully submit there is probable cause to
18 believe that within the 2001 silver Dodge Caravan, bearing Vehicle Identification Number
19 (VIN) 1B4GP253X2B558838 and Arizona License Plate ATA6BXA, there exists evidence
20 of violations of Title 18 U.S.C. §§ 1153 and 1111, First Degree Murder, Title 18 U.S.C.
21 §§ 1153, 1111, and 3559(f), First Degree Murder of a Child, and Title 18 U.S.C. §§
22 924(c)(1)(A) and (j), Use of a Firearm During a Crime of Violence Resulting in Death.

23 10. Accordingly, I request the Court issue a warrant allowing the United States
24 to search the 2001 silver Dodge Caravan, bearing Vehicle Identification Number (VIN)
25 1B4GP253X2B558838 and Arizona License Plate ATA6BXA, described in Attachment
26 A, for the items described in Attachment B.

Respectfully submitted,

Date 10/5/2022

Subscribed and sworn before me this 5th of October, 2022.


HONORABLE CAMILLE D. BIBLES
United States Magistrate Judge